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Of Counsel

August 9, 2019

Clerk of the Court
United States District Court
Eastern District of Michigan
231 W. Lafayette Boulevard
Detroit, Michigan 48226

F I L E D
AUG 12 2019
CLERK'S OFFICE
DETROIT

Re: Shimmel vs. Moody, et al
File No. 18-cv-13334

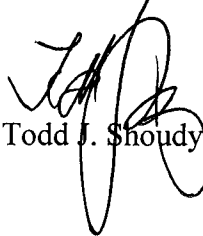
Dear Clerk:

Enclosed please find Defendants' Ex Parte Motion for Leave to File Exhibit in the Traditional Manner together with a CD/DVD for filing regarding the above matter.

If you have any questions or comments, please feel free to give me a call.

Very truly yours,

FLETCHER FEALKO
SHOUDY & FRANCIS, P.C.


Todd J. Shoudy

TJS/kaw
Enclosures
cc: Neal J. Wilensky (w/enclosures)

Placed on shelf
in records.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

STEVEN VANCE SHIMMEL by
Personal representative, ROBERT SHIMMEL,

Plaintiffs,

vs.

Case No. 1:18-cv-13334
Hon. Laurie J. Michelson
Magistrate:
Elizabeth A. Stafford

LIEUTENANT JOHN MOODY, DEPUTY
ADAMCZYK, DEPUTY JASON JAMES,
DEPUTY AMY VERRAN and DEPUTY
JENNIFER MORDE, Jointly and Severally,

Defendants.

NEAL J. WILENSKY (P35182)
Law Office of Neal J. Wilensky, PC
Attorney for Plaintiff
6005 W. St. Joseph, Suite 303
Lansing, Michigan 48917
(517) 323-1111

TODD J. SHOUDY (P41895)
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**EX PARTE MOTION FOR LEAVE TO FILE EXHIBITS IN THE
TRADITIONAL MANNER**

NOW COME Defendants Lieutenant John Moody, Deputy Adamczyk, Deputy Jason James and Deputy Amy Verran (hereinafter referred to as “Defendants”), by their attorneys, Fletcher Fealko Shoudy & Francis, P.C., and pursuant to Local Rule 5.1.1, move this Honorable Court for leave to file a computer disc as Exhibits to its Brief in Support of Defendants’ Motion for Summary Judgment in the traditional manner (non-electronically).

1. The proposed Exhibit A is a CD/DVD of the Jail Video Arraignment of Plaintiff, Steven Shimmel, following his arrest on November 21, 2017.

2. The proposed Exhibit B is a CD/DVD of the Jail CCTV Video of the video monitor of Cell C where Plaintiff, Steven Shimmel, was placed in the Sanilac County Jail, and the software to play the video.

3. The CD/DVD and the video files are key pieces of evidence which are offered in support of Defendants’ Motion for Summary Judgment and referenced therein as Exhibits A and B. This file is too large to file electronically using the Court’s E-filing system.

WHEREFORE, Defendants, for good cause shown, request an Order permitting Defendants to file the above referenced CD/DVD, in the traditional manner, in support of its Motion for Summary Judgment.

FLETCHER FEALKO
SHOUDY & FRANCIS, P.C.
Attorneys for Defendants

By: /s/ Todd J. Shoudy
Fletcher Fealko Shoudy & Francis, P.C.
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Michigan Bar #41895
tshoudy@fletcherfealko.com

The undersigned certifies that a copy of the foregoing instrument was served upon attorney for Plaintiff on August 9, 2019, by first class mail.

/s/ Kathleen A. Williams
Kathleen A. Williams
Fletcher Fealko Shoudy & Francis, P.C.
1411 Third Street, Suite F
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Date: August 9, 2019

Shimmelt vs. Moody

18-cv-13334

DVD

8/9/19

First Class Mail

RECEIVED
AUG 12 2019
CLERK'S OFFICE
U.S. DISTRICT COURT

FLETCHER FEALCO SHOUDY & FRANCIS, P.C.
ATTORNEYS & COUNSELORS
1411 THIRD STREET, STE. F
PORT HURON, MICHIGAN 48060

TO: Clerk of the Court
United States District Court
Eastern District of Michigan
231 W. Lafayette Boulevard
Detroit, Michigan 48226

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